

1 **SHANNON TAITANO, ESQ.**
2 **OFFICE OF THE GOVERNOR OF GUAM**
3 Ricardo J. Bordallo Governor's Complex
4 Adelup, Guam 96910
Telephone: (671) 472-8931
Facsimile: (671) 477-4826

5 **ARNE D. WAGNER, ESQ.**
6 **RODNEY J. JACOB, ESQ.**
7 **DANIEL M. BENJAMIN, ESQ.**
8 **CALVO & CLARK, LLP**

Attorneys at Law
655 South Marine Corps Drive, Suite 202
Tamuning, Guam 96913
Telephone: (671) 646-9355
Facsimile: (671) 646-9403

Attorneys for *Felix P. Camacho, Governor of Guam*

FILED
DISTRICT COURT OF GUAM
MAR 16 2006 *MP*
MARY L.M. MORAN
CLERK OF COURT

13 IN THE UNITED STATES DISTRICT COURT
14 DISTRICT OF GUAM

15 JULIE BABAUTA SANTOS, et. al.,

16 Petitioners,

17 -v-

18 FELIX P. CAMACHO, etc., et. al.

19 Respondents.
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CIVIL CASE NO. 04-00006

**REQUEST FOR SETTLEMENT
CONFERENCE PURSUANT TO
LOCAL RULE 16.6**

ORIGINAL

1 Pursuant to Local Rule 16.6, Governor of Guam Felix P. Camacho (the "Governor"),
2 acting in his official capacity and on behalf of the Government of Guam pursuant to the Order re:
3 Objections to Magistrate Order of September 19, 2005, hereby requests that the Court Order that
4 the following related actions be set for a global settlement conference: (1) *Santos v. Camacho*,
5 Civil Case No. 04-00006; (2) *Torres v. Govt. of Guam*, Civil Case No. CV04-00038; and (3)
6 *Simpao v. Gov't of Guam*, Civil Case No. CV04-00049.

7 The Governor requests that this conference be set based upon the recent Orders of the
8 Court in these three cases and the Court's recent remarks at the hearing held on March 14, 2006
9 in these three cases. As the Court knows, the Governor's highest priority is to be able to proceed
10 with the process of obtaining approval of the *Santos* settlement and implementing that settlement
11 so that EITC payments may commence. Based upon the Court's comments, it appears that the
12 fastest approach to this issue may be global settlement talks with all parties to the three actions.¹

13 The Governor respectfully suggests that the parties be given an initial thirty days in which
14 to find a mutually agreeable mediator, and to schedule and hold a non-binding, confidential
15 mediation. At the end of the thirty days, the parties can then report their progress to the Court.
16 The Governor is hopeful that this approach will be agreeable to all of the parties. Copies of this
17 request are being served on the counsel of record for the parties to the *Torres* and *Simpao* action.

18 DATED this 16th day of March, 2005.

19 OFFICE OF THE GOVERNOR OF GUAM
20 CALVO & CLARK, LLP
21 Attorneys for Respondent
22 *Felix P. Camacho, Governor of Guam*

23 By: 
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DANIEL M. BENJAMIN

26 ¹ The Governor still respectfully maintains his position that the best course is that the
27 *Torres* and *Simpao* cases be stayed and the *Santos* settlement proceed. This request for a
28 settlement conference is not a waiver of that position. However, the Governor recognizes that
under the present circumstances it is best to prioritize the goal of quickly implementing the
settlement, if necessary, over any other positions he has.